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Effect of Invalidity of Legislative Apportionment.—The Kentucky Court of Appeals in *Adams v. Bosworth*, 102 Southwestern Reporter, 861, announces a doctrine indicated in *Ragland v. Anderson*, 100 Southwestern Reporter, 865, that the declaring of an act apportioning the state into legislative and senatorial districts as invalid because creating unequal districts does not require that an earlier apportionment act must also be declared unconstitutional, because it also created unequal districts, though in a lesser degree. As the apportionment made by the earlier law had been accepted without question by the people of the state for a long period (13 years in this case), the court was of the opinion that, if for no other reason, the long acquiescence of the public in such act would be a sufficient reason for now refusing to declare it unconstitutional.

Presumption as to Validity of Marriage.—The Missouri Supreme Court in *Johnson v. St. Joseph Terminal Railroad Company*, 101 Southwestern Reporter, 641, holds that the presumption of innocence on the part of parties to a marriage contract, which presumption is stronger than all counter presumptions in such cases, throws the burden of proof on parties denying the validity of the marriage, even to the extent of requiring such parties to prove a negative. As supporting case are cited *Klein v. Laudman*, 29 Mo. 259; *Hunter v. Hunter*, 111 Cal. 261, 43 Pacific Reporter, 756, 31 L. R. A. 411, 52 Am. St. Rep. 180; *Schuchart v. Schuchart*, 61 Kan. 597, 60 Pacific Reporter, 311, 50 L. R. A. 180, 78 Am. St. Rep. 342; and *Boulden v. McIntire*, 119 Ind. 574, 21 Northeastern Reporter, 445, 12 Am. St. Rep. 453.

State Regulation of Connecting Carriers.—The United States Supreme Court, in *Atlantic Coast Line Railroad Company v. North Carolina Corporation Commission*, 27 Supreme Court Reporter, 585, 206 U. S. 1, 51 L. Ed. 933, holds that a ruling of the state commission requiring the operation of an extra train at a loss in order to restore connections at a certain station is not so arbitrary and unreasonable as to amount to a denial of due process of law, or to a deprivation of the equal protection of the law, so long as the income of the railroad company from its business in the state affords adequate remuneration.

Constitutional Law.—The Supreme Court of Arkansas in *State v. St. Louis & S. F. Railway Company*, 103 Southwestern Reporter, 623, holds that a law requiring railroad companies to keep depot waiting rooms open day and night, except in certain cases, and to keep them at all proper times comfortably heated, and at all times supplied with drinking water, does not violate the provisions of the fourteenth amendment of the United States Constitution.